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April 27, 2007

The Honorable Colleen McMahon
United States District Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 640
New York, New York 10007

Re: United States v. James Marquez
Criminal Docket No: 06-CR 1138

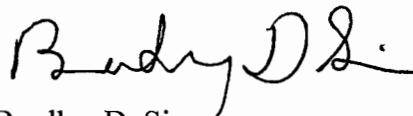
Dear Judge McMahon:

Our firm was retained earlier this month to represent Mr. Marquez in connection with his sentencing before Your Honor. The sentencing date is currently scheduled for May 11, 2007. The underlying facts in this case are quite complex and we have been working diligently since our retention to review the files in this matter so that we will be fully prepared for sentencing. In view of the myriad number of issues to be addressed, we respectfully submit this letter application requesting that Mr. Marquez' sentencing be adjourned for sixty days.

I have spoken to Assistant U.S. Attorney Marjorie Feinzig who has no objection to this request.

Your Honor's attention to this request is greatly appreciated.

Respectfully submitted,



Bradley D. Simon

cc: AUSA Margery B. Feinzig